



THE CITY OF NEW YORK
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January 14, 2021

Via ECF

Honorable Sarah L. Cave
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Raymond v. City of New York, et al.
Case No. 15-cv-006885 (LTS)(SLC)

Dear Judge Cave:

I am the Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel for the City of New York, assigned to represent the defendants in the above-captioned action. Pursuant to ¶II(C)(5) of the Court's Individual Practices, defendants respectfully seek leave to file under seal their response to plaintiffs' January 13, 2021 letter motion to compel, which is also being filed under seal. *See* Dkt. 256. Defendants' response references their November 16, 2020 document production that is the subject of plaintiffs' December 1, 2020 motion that was filed under seal. *See* Dkt. 244. Accordingly, defendants respectfully submit that good cause exists to file the response under seal. *See Lugosch v. Pyramid Co.*, 435 F.3d 110, 120 (2d Cir. 2006).

Defendants thank the Court for its attention to this matter.

Respectfully submitted,

/s/

Yuval Rubinstein
Assistant Corporation Counsel
Attorney for Defendants

Defendants' Letter-Motion to Seal (ECF No. 258) is GRANTED, and Defendants' January 14, 2021 letter response (ECF No. 259) shall remain as only visible to the case participants.

The Clerk of Court is respectfully directed to close ECF No. 258.

SO-ORDERED 1/15/2021


SARAH L. CAVE
United States Magistrate Judge